

SHER TREMONTE LLP

March 26, 2020

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)

Dear Judge Garaufis:

I write to respectfully request additional time to file Kathy Russell's objections to the Presentence Investigation Report ("PSR"). Your Honor previously extended Ms. Russell's deadline to file objections by 14 days, or to March 27, 2020. I respectfully request an additional 14 days, or until April 10, 2020. Counsel has been unable to sufficiently address Ms. Russell's objections because of challenges with the transition to working remotely due to the COVID-19 pandemic.

The government, by AUSA Tanya Hajjar, and Probation do not object to Ms. Russell's request.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)